

1 Patrice L. Bishop (182256)
2 pbishop@ssbla.com
3 **STULL, STULL & BRODY**
4 10940 Wilshire Blvd., Suite 2300
5 Los Angeles, CA 90024
6 Telephone: (310) 209-2468
7 Facsimile: (310) 209-2087

8
9 Counsel for Plaintiff Chris Crimi
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

11 CHRIS CRIMI, on Behalf of Himself and All) Case No. 08-cv-02249-CRB
12 Others Similarly Situated,)
13 v.) CLASS ACTION
14 EDWARD W. BARNHOLT, et al.) **STIPULATION AND [PROPOSED]**
15) **ORDER RESCHEDULING THE MAY 30,**
16) **2008 CASE MANAGEMENT**
17) **CONFERENCE**
18)
19)

20 IN RE KLA-TENCOR CORP. SECURITIES) Master File No. 06-cv-04065-CRB
21 LITIGATION)
22)
23)
24)
25)
26)
27)
28)

[08-02249-CRB] STIPULATION AND [PROPOSED] ORDER RESCHEDULING THE
MAY 30, 2008 CASE MANAGEMENT CONFERENCE

In Master File No. 06-cv-04065-CRB, Lead Plaintiffs Police and Fire Retirement System of the City of Detroit (“PFRS”), Louisiana Municipal Police Employees’ Retirement System (“MPERS”) and the City of Philadelphia Board of Pensions and Retirement (“CPBPR”) and defendants KLA-Tencor Corporation (“KLA-Tencor”), Richard P. Wallace (“Wallace”), Kenneth L. Schroeder (“Schroeder”), Kenneth Levy (“Levy”), Jon D. Tompkins (“Tompkins”), Stephen P. Kaufman (“Kaufman”), Gary E. Dickerson (“Dickerson”), Jeffrey L. Hall (“Hall”), John H. Kispert (“Kispert”), Lida Urbanek (“Urbanek”), Michael E. Marks (“Marks”), Edward Barnholt (“Barnholt”), Robert T. Bond (“Bond”), Richard J. Elkus, Jr. (“Elkus”), H. Raymond Bingham (“Bingham”), Dean O. Morton (“Morton”) and Stuart J. Nichols (“Nichols”) (collectively “Individual Defendants” and, together with KLA-Tencor, “Defendants”), by and through their respective counsel, hereby recite and stipulate, subject to Court approval, as follows:

In Case No. 08-cv-02249-CRB, Plaintiff Chris Crimi (“Crimi”) and defendants KLA-Tencor, Barnholt, Bingham, Bond, Elkus, Jr., Kaufman, Levy, Marks, Morton, Schroeder, Tompkins and Wallace, by and through their respective counsel, hereby recite and stipulate, subject to Court approval, as follows:

RECITALS

WHEREAS the Court scheduled a case management conference for May 30, 2008 at 8:30 a.m. in Courtroom 8, 19th Floor, San Francisco before the Honorable Charles R. Breyer in both Master File No. 06-cv-04065 and Case No. 08-cv-02249-CRB. The Court further ordered the case management statement due on or before May 23, 2008;

WHEREAS counsel for Lead Plaintiffs in Master File No. 06-cv-04065-CRB has a scheduling conflict on May 30, 2008 and, therefore, has requested that the parties to Master File No. 06-cv-04065-CRB and Case No. 08-cv-02249-CRB agree to reschedule the case management conference to June 13, 2008; and

WHEREAS the parties have agreed that, subject to the Court's approval, the case management conference in Master File No. 06-cv-04065-CRB and Case No. 08-cv-02249-CRB should be rescheduled to June 13, 2008 at 8:30 a.m. in Courtroom 8, 19th Floor, San Francisco

1 before the Honorable Charles R. Breyer. The parties also have agreed that the case management
2 statement shall be due on or before June 6, 2008.

3 **STIPULATION**

4 Now, therefore, the parties agree and stipulate as follows, subject to Court approval:

5 1. The case management conference in the above-captioned actions is rescheduled to
6 June 13, 2008 at 8:30 a.m. in Courtroom 8, 19th Floor, San Francisco before the Honorable Charles
7 R. Breyer.

8 2. The case management statement shall be due on or before June 6, 2008.

9 DATED: May 21, 2008

**BERMAN DEVALERIO PEASE TABACCO
BURT & PUCILLO**

10 By: /s/ Nicole Lavallee
11 NICOLE LAVALLEE

12 Joseph J. Tabacco, Jr.
13 Christopher T. Heffelfinger
14 Lesley Hale
15 425 California Street, Suite 2100
San Francisco, CA 94104-2205
Telephone: (415) 433-3200
Facsimile: (415) 433-6382

16 **Plaintiffs' Executive Committee and Liaison
17 Counsel in Master File No. 06-cv-04065-CRB**

18 **KOHN, SWIFT & GRAF, P.C.**
19 Denis F. Sheils
Joseph C. Kohn
William E. Hoese
20 One South Broad Street, Suite 2100
Philadelphia, PA 19107
21 Telephone: (215) 238-1700
Facsimile: (215) 238-1968
Email: dsheils@kohnswift.com
Email: jkohn@kohnswift.com
Email: whoese@kohnswift.com

BERGER & MONTAGUE, P.C.

Sherrie R. Savett
Douglas M. Risen
1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
Email: ssavett@bm.net
Email: drisen@bm.net

TRUJILLO RODRIGUEZ & RICHARDS LLC

Kenneth I. Trujillo
Ira Neil Richards
Kathryn C. Harr
1717 Arch Street, Suite 3838
Philadelphia, PA 19103
Telephone: (215) 731-9004
Facsimile: (215) 731-9044
Email: KITrujillo@trrlaw.com
Email: ira@trrlaw.com
Email: kharr@trrlaw.com

**Plaintiffs' Executive Committee in Master
File No. 06-cv-04065-CRB**

E-Filing Attestation

I, Nicole Lavallee, am the ECF User whose ID and password are being used to file this document. In compliance with General Order 45 X.B., I hereby attest that each of the signatories identified below has concurred in this filing.

Dated: May 20, 2008

STULL, STULL & BRODY

By: /s/ Patrice L. Bishop
PATRICE L. BISHOP

10940 Wilshire Blvd, Suite 2300
Los Angeles, CA 90024
Telephone: (310) 209-2468
Facsimile: (310) 209-2087
Email: service@ssbla.com

**Attorneys for Plaintiff Chris Crimi in Case
No. 08-cv-02249-CRB**

1 DATED: May 21, 2008

MORGAN, LEWIS & BOCKIUS LLP

2 By: /s/ Thomas R. Green

3 THOMAS R. GREEN

4 Joseph E. Floren
5 John H. Hemann
6 Benjamin P. Smith
7 Christopher J. Banks
8 Tera M. Heintz
9 One Market, Spear Street Tower
10 San Francisco, CA 94105-1126
11 Telephone: (415) 442-1000
12 Facsimile: (415) 442-1001
13 Email: jfloren@morganlewis.com
14 Email: jhemann@morganlewis.com
15 Email: bpsmith@morganlewis.com
16 Email: cbanks@morganlewis.com
17 Email: theintz@morganlewis.com

18
19
20
21
22
23
24
25
26
27
28
Attorneys for Defendants KLA-Tencor Corporation, John H. Kispert, Edward W. Barnholt, H. Raymond Bingham, Robert J. Boehlke, Robert T. Bond, Richard J. Elkus, Jr., Jeffrey Hall, Stephen P. Kaufman, Michael E. Marks, Dean O. Morton, Richard P. Wallace and Lida Urbanek in Master File No. 06-cv-04065-CRB and for Defendant KLA-Tencor Corporation in Case No. 08-cv-02249-CRB

DATED: May 21, 2008

HELLER EHRMAN LLP

19 By: /s/ Warrington S. Parker, III

20 WARRINGTON S. PARKER, III

21 Michael J. Shepard
22 333 Bush Street
23 San Francisco, CA 94104
24 Telephone: (415) 772-6000
25 Facsimile: (415) 772-6268
26 Email: michael.shepard@hellerehrman.com
27 Email: warrington.parker@ hellerehrman.com

28
Attorneys for Defendant Jon D. Tompkins in Master File No. 06-cv-04065-CRB

1 DATED: May 21, 2008

DLA PIPER US LLP

2 By: /s/ David A. Priebe
3 DAVID A. PRIEBE

4 2000 University Avenue
5 East Palo Alto, California 94303
6 Telephone: (650) 833-2056
7 Facsimile: (650) 833-2001
8 Email: david.priebe@dlapiper.com

9 **Attorneys for Defendant Kenneth L.
10 Schroeder in Master File No. 06-cv-04065-
11 CRB**

12 DATED: May 21, 2008

SHEARMAN & STERLING LLP

13 By: /s/ Emily V. Griffen
14 EMILY V. GRIFFEN

15 Jeffrey S. Facter
16 Patrick D. Robbins
17 525 Market Street, Suite 1500
18 San Francisco, CA 94105
19 Telephone: (415) 616-1100
20 Facsimile: (415) 616-1199
21 Email: jfacter@shearman.com
22 Email: probbins@shearman.com
23 Email: mmoycik@shearman.com

24 **Attorneys for Defendant Kenneth Levy in
25 Master File No. 06-cv-04065-CRB**

26 DATED: May 21, 2008

ORRICK, HERRINGTON & SUTCLIFFE

27 By: /s/ Robert P. Varian
28 ROBERT P. VARIAN

29 Walter F. Brown, Jr.
30 405 Howard Street
31 San Francisco, CA 94105
32 Telephone: (415) 773-5700
33 Facsimile: (415) 773-5759
34 Email: wbrown@orrick.com
35 Email: rvarian@orrick.com

36 **Attorneys for Defendant Gary Dickerson in
37 Master File No. 06-cv-04065-CRB**

1 DATED: May 21, 2008

2 **LAW OFFICE OF MARK A. BELNICK,
3 LLC**
4 By: /s/ Mark A. Belnick
5

6 MARK A. BELNICK

7 Mark A. Belnick (pro hac vice)
8 120 West 45th Street, Suite 1700B
9 New York, NY 10036
10 Telephone: (646) 453-2901
11 Facsimile: (646) 453-2908
12 Email: mbelnick@belnicklaw.com

13 Christopher D. Kercher (pro hac vice)
14 AKIN GUMP STRAUSS HAUER
15 & FELD LLP
16 590 Madison Avenue
17 New York, NY 10022
18 Telephone: (212) 872-1000
19 Facsimile: (212) 872-1002
20 Email: ckercher@akingump.com

21 Steven S. Kaufhold
22 AKIN GUMP STRAUSS HAUER
23 & FELD LLP
24 580 California Street, 15th Floor
25 San Francisco, CA 94104
26 Telephone: (415) 765-9500
27 Facsimile: (415) 765-9501
28 Email: skaufhold@akingump.com

29 **Attorneys for Defendant Stuart J. Nichols in
30 Master File No. 06-cv-04065-CRB**

31 **ORDER**

32 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:**

33 1. The case management conference, currently scheduled for May 30, 2008 at 8:30
34 a.m., is rescheduled to June 13, 2008 at 8:30 a.m. in Courtroom 8, 19th Floor, San Francisco before
35 the Honorable Charles R. Breyer.

36 2. The case management statement shall be due on or before June 6, 2008.

37 DATED: May ___, 2008

38

39 United States District Judge